

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

| | | |
|-------------------------------|---|------------------------------|
| LONESTAR INVENTIONS, L.P. | § | |
| Plaintiff, | § | |
| | § | |
| v. | § | CIVIL ACTION NO. 6:07cv27LED |
| | § | |
| FREESCALE SEMICONDUCTOR, INC. | § | |
| and AGERE SYSTEMS, INC. | § | |
| Defendants. | § | JURY TRIAL DEMANDED |

**PLAINTIFF'S REPLY TO DEFENDANT
FREESCALE SEMICONDUCTOR, INC.'S COUNTERCLAIMS**

COMES NOW Plaintiff Lonestar Inventions, L.P. and, pursuant to Rule 12 of the Federal Rules of Civil Procedure, files this its Reply to Defendant Freescale Semiconductor, Inc.'s Counterclaims ("Counterclaims"), and for its Reply states the following:

1. Plaintiff admits the allegations of paragraph 19 of the Counterclaims.
2. Plaintiff admits the allegations of paragraph 20 of the Counterclaims.
3. Plaintiff admits the allegations of paragraph 21 of the Counterclaims.
4. Plaintiff admits the allegations of paragraph 22 of the Counterclaims.
5. Paragraphs 1 through 13 of Defendants' answer, incorporated by reference into the Counterclaims at paragraph 23, constitute Freescale's admissions and denials responsive to Plaintiff's Complaint, and do not constitute allegations subject to admission or denial by Plaintiff. Plaintiff denies the allegations of paragraphs 14 through 18 of Defendant's answer, incorporated into the Counterclaims at paragraph 23. As stated in

the previous 4 paragraphs, Lonestar admits the allegations of paragraphs 19 through 22 of the Counterclaims, also incorporated in paragraph 23 of the Counterclaims.

6. Plaintiff admits the allegations of paragraph 24 of the Counterclaims.

7. Plaintiff admits the allegations of paragraph 25 of the Counterclaims.

8. Plaintiff admits the allegations of paragraph 26 of the Counterclaims.

9. Plaintiff denies the allegations of paragraph 27 of the Counterclaims.

10. Plaintiff denies the allegations of paragraph 28 of the Counterclaims.

11. Plaintiff denies that Defendant is entitled to the relief set forth in its prayer.

WHEREFORE, PREMISES CONSIDERED, Plaintiff Lonestar Inventions, L.P. respectfully prays upon final trial hereof, Defendant Freescale Semiconductor, Inc. take nothing by its Counterclaims, and go hence without day, and that judgment be rendered in favor of Lonestar Inventions, L.P. on the claims set forth in Plaintiff's Complaint and Application for Permanent Injunction.

Respectfully submitted,

By: /s/ Phillip T. Bruns
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this notice was served on all counsel who have consented to electronic service on this 11th day of June, 2007.

/s/ Phillip T. Bruns
Phillip T. Bruns